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## POLICY ON HUMAN RIGHTS AND LABOUR STANDARDS

### Introduction

Tubestar is committed to protecting the human rights of everyone who works for the company and all those who have dealings with it. As a responsible company, we support the United Nations Universal Declaration of Human Rights that sets “common standards of achievement for all people and all nations”

We recognize that our responsibility for human rights and labour conditions encompasses:

- Operating sites - In developed countries, performance on most of the issues covered in this policy will be required by law. Therefore, this policy is primarily provided to guide operations in those emerging markets where concerns are regularly expressed about human rights.
- Supply chain - It is our aspiration that the working conditions throughout our supply chain meet internationally-accepted standards of human rights and working conditions

### Responsibility

We believe that everyone in our organization is responsible for having due regard for human rights. In particular:

- The Board has overall responsibility for ensuring that human rights considerations are integral in the way in which existing operations and new opportunities are developed and managed.
- Managers and supervisors provide visible leadership that promotes human rights as an equal priority to other business issues. They also have a responsibility for identifying abuses that occur.
- All employees are responsible for ensuring that their own actions do not impair the human rights of others. They are also encouraged to bring forward, in confidence, any concerns that they may have about human rights abuses.

### Effecting action

We recognize that from time to time we will encounter challenges on human rights that are bigger than Tubestar is able to tackle alone. Many human rights abuses are systemic in their host communities. We are therefore committed to working with other organizations that can help us implement this policy effectively over time.

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## **Policy principles**

Tubestar requires that all its operating units seek to abide by the following:

### **Child labour**

We will not employ workers under the legal minimum age for admission to work stipulated by the laws of the countries where we work and will operate in accordance with ILO conventions No. 138 on the minimum age for admission to employment and No.182 on the banning of the worst forms of exploitation of child labour.

### **Forced labour**

In accordance with ILO Conventions 29 on Forced Labour and 105 on the Abolition of Forced Labour, we will not make any use of forced labour, including prison or debt-bondage labour. We will not require the lodging of deposits or identity papers, either by our operating companies or agencies providing employees.

### **Health and safety**

We will provide a safe and healthy work environment and take all reasonable steps to prevent death or injury to anyone on our sites. Regular training to all our crew on health and safety issues will be provided. All workers will have access to bathroom facilities and potable water.

Most aspects of health and safety are covered by existing Tubestar OHSE system.

### **Freedom of association and the right to collective bargaining**

We respect the principles of freedom of association and collective bargaining as defined in ILO convention No. 87 on the freedom of trade unions and the protection of trade union law and No. 98 on the right of organization and collective bargaining.

### **Discrimination**

In accordance with ILO Convention 111 on Discrimination, we will not discriminate against any person based on race, caste, origin, religion, disability, gender, sexual orientation, union or political affiliation or age. We will not tolerate sexual or racial harassment or bullying.

### **Discipline**

We will not employ, or allow to be employed, any form of corporal punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through proper procedures.

**Working hours**

Working hours in our businesses, including rest days and holidays are informed by various applicable statutory bodies and prevailing national laws.

**Compensation**

Wages paid for standard working hours must meet local legally-mandated minimum wage levels. However, they must also be sufficient to meet the basic needs of workers and their families.

**Living conditions**

In sites where dormitory accommodation is provided to our crew, we will ensure that this accommodation is of an acceptable standard of size and cleanliness; that it is appropriate to local customs and norms and that adequate facilities are provided.

**Responsibility**

Responsibility for the compliance of Tubestar with this policy lies ultimately with the Board. Responsibility for the implementation of the policy lies with the Directors who are required to develop procedures. They work with Operations personnel who are responsible for the day-to-day implementation of the policy.

**Hardik Mehta**  
**Director**

Date: 1<sup>st</sup> August 2015